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Attorneys for Plaintiff
TONIE M. PUGH

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

TONIE M. PUGH)	Case No.: 2:22-cv-01674-AC
Plaintiff,)	
v.)	STIPULATION TO EXTEND TIME
)	TO FILE MOTION FOR SUMMARY
KILOLO KIJAKAZI,)	JUDGMENT
Acting Commissioner of Social)	
Security,)	(FIRST REQUEST)
)	
Defendant.)	

Plaintiff Tonie M. Pugh and Defendant Kilolo Kijakazi, Acting
Commissioner of Social Security, through their undersigned attorneys, stipulate,
subject to this court's approval, to extend the time by 7 days from February 10,
2023 to February 17, 2023 for Plaintiff to file a motion for summary judgment,
with all other dates in the Court's Scheduling Order extended accordingly.

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1 This is Plaintiff's first request for an extension. Plaintiff's counsel requests
2 additional time due to losing about half a day of work on February 2, 2023, and
3 almost a full day of work on February 3, 2023, due to unexpected technological
4 problems working remote and accessing consistent internet. Counsel is working
5 from his office until the technological problems are resolved. While counsel only
6 lost about a day and half of work, counsel requests a seven-day extension due to
7 having another motion for summary judgment due on February 10, 2023, two
8 administrative hearings on remand this week to prepare for and participate in, and
9 two district court replies due the following week. This request is made at the
10 request of Plaintiff's counsel to allow additional time to fully research the issues
11 presented.

12 DATE: February 6, 2023 Respectfully submitted,

13 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

14 /s/ *Matthew F. Holmberg*

15 BY:

Matthew F. Holmberg
Attorney for plaintiff Ms. Tonie M. Pugh

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18 DATE: February 6, 2023

19 PHILLIP TALBERT
United States Attorney
20 MATHEW W. PILE
Associate General Counsel
21 Social Security Administration

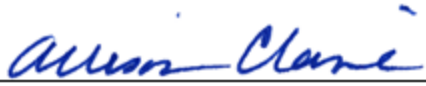
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23 /s/ *Geralyn A. Gulseth*

24 BY:

Geralyn A. Gulseth
Special Assistant United States Attorney
Attorneys for defendant Kilolo Kijakazi,
Acting Commissioner of Social Security
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26 [*authorized by e-mail]

1 IT IS SO ORDERED:

2 DATED: February 7, 2023

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4 ALLISON CLAIRE
5 UNITED STATES MAGISTRATE JUDGE
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